

EXHIBIT F

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 * * *

5 NATHANEAL TAYLOR,
6 Plaintiff,

7
8 - vs. -

Case No. 03-73595

9 Hon. Paul Borman

10
11 CITY OF DETROIT, GREG EDWARDS; BARBARA SIMON;
12 ERNEST WILSON; TERRILL SHAW; JAMES FISHER;
13 DWIGHT PEARSON; INDIVIDUALLY and IN THEIR
14 OFFICIAL CAPACITIES, jointly and severally.
15 Defendants. /

16
17 DEPONENT: ERNEST WILSON, Continued

18 DATE: Thursday, July 22, 2004

19 TIME: 10:20 a.m.

20 LOCATION: 660 Woodward, Suite 1650
21 Detroit, Michigan 48226

22
23 REPORTED BY: JENNIFER DIANE CLAUSON, CSR-6867

24 Empire Court Reporting

25 Telephone (248) 683-8516

1 Q. Okay. Did you have him sign a constitutional
2 rights form?

3 A. No, I did not.

4 Q. Okay. Anything else you discussed with him other
5 than going over to the house other than he may be a
6 suspect?

7 A. No.

8 Q. Okay. Did he say anything to you when you went to
9 get a consent to search?

10 A. Uh-huh.

11 Q. What did he say to you?

12 A. He said he don't have no problem signing a consent
13 to search. He ain't got nothing to do with
14 anything.

15 Q. Okay. He's got nothing to hide?

16 A. Consent to search and left.

17 Q. He's got nothing to hide, right?

18 A. That's what he said.

19 Q. Okay. At any time, have you ever been able to
20 gather any physical evidence in this case that
21 would indicate that Mr. Taylor committed the crime
22 of murder on Mr. Joyce?

23 A. When you say physical evidence, you're talking
24 about articles of a fact. We have evidence within
25 the case that has mentioned Nathaneal Taylor in the

1 area of Mr. Nathaneal Taylor having conflict with
2 the individual. Those are part of what I would say
3 are facts within the case.

4 Q. Okay. What about physical evidence?

5 A. Yeah. I have a dead body.

6 Q. Okay. Besides the dead body?

7 A. I don't recall any other physical evidence.

8 Q. Okay. So you believe the best evidence that you
9 have in this case is Mr. Taylor being in the area
10 having an argument with this person?

11 A. I can't say that in the words that you used at best
12 evidence.

13 Q. Okay.

14 A. I would say the tangible evidence that was used
15 based upon the investigator's report is what was
16 submitted to the prosecutors. Upon the prosecutor
17 signing the warrant, that's what they use as their
18 evidence. That doesn't have anything to do with my
19 decisions or anything else. So I can't even answer
20 to the best evidence that I have. It's the best
21 evidence that the state is pursuing.

22 Q. Okay. You prepare the request for warrant,
23 correct?

24 A. I sure do.

25 Q. Okay. And on the request for warrant, it's

1 important to put all the evidence that you have,
2 correct?

3 A. It's important not to tell a lie.

4 Q. Right. And it's important not to omit things,
5 correct? Because that's a lie also; isn't it?

6 A. Well, there's some things you just don't put in
7 there.

8 Q. Okay.

9 A. Like while I was at the scene, I saw a dog run
10 across the front porch.

11 Q. Right.

12 A. I'm not going to put that in there. There's a lot
13 of things that you don't put in, but the tangible
14 things of what you've done in your investigation,
15 the statements that you take, the purposes of the
16 case is what's put into the investigator's report.

17 Q. Okay. And in that respect, it's important not to
18 omit important facts that would directly pertain to
19 this case?

20 A. As you believe what you believe are facts are
21 facts. I'm not omitting any facts to the case.

22 Q. Okay. That would be inappropriate for you to omit
23 facts, correct?

24 A. It would be inappropriate for me to omit facts that
25 have anything to do with the preparation of the

1 investigator's report.

2 Q. Okay. Now, you believe this incident that may have
3 occurred between -- or this argument that occurred
4 between Mr. Taylor and the deceased was important,
5 correct?

6 A. Correct.

7 Q. Okay. Were you able to determine that there was
8 any arguments between any other suspects in this
9 instance?

10 A. No. Not right then.

11 Q. Okay. At any time during your investigation and
12 before you submitted the warrant, were you able to
13 determine if there was any arguments between any --

14 A. I determined that there was some problems that the
15 person had with other people concerning other
16 things, but nothing of a immediate nature to
17 warrant this situation to change.

18 Q. Okay. And that was your determination that you
19 made, correct?

20 A. Absolutely correct.

21 Q. Okay. Would that be something that you should put
22 down on the request for warrant?

23 A. No, it's not.

24 Q. Why not?

25 A. Because it doesn't have anything to pertain to this

1 situation.

2 Q. Okay. Who makes the decision on when you go
3 forward with the presentation of a warrant to the
4 prosecutor?

5 A. Usually the officer in charge of the case.

6 Q. And that would be you, correct?

7 A. That would be myself or it would be the -- it all
8 depends on what type of case it is also.

9 Q. How about in this case? Whose decision was it?

10 A. My decision.

11 Q. Okay. Assume that you have no statement from Mr.
12 Ross claiming that Mr. Taylor told him that Mr.
13 Taylor committed the murder. Would you have
14 submitted this warrant to the prosecutor?

15 A. It could have been a possibility, yes.

16 Q. Okay. Based upon what?

17 A. Based upon the investigation. There's always a
18 possibility. Based upon the situation with the
19 person -- what is the name of the gentleman?

20 MS. COLE: Gales? Hilliard Hampton?

21 THE WITNESS: The one that lived across the
22 street from the dope house.

23 MS. COLE: Maddox?

24 THE WITNESS: Maddox. Based upon some of
25 the things that he told me the allocation of this